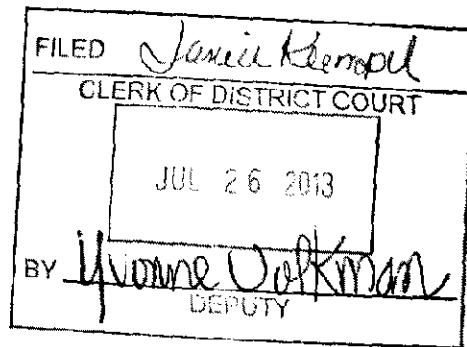


NICK MAZANEC
Special Deputy Richland County Attorney
Special Assistant Attorney General
Office of the Commissioner of Securities and
Insurance, Montana State Auditor (CSI)
840 Helena Ave.
Helena, Montana 59601
(406) 444-2040



Attorney for the State of Montana

MONTANA SEVENTH JUDICIAL DISTRICT COURT, RICHLAND COUNTY

STATE OF MONTANA,

Plaintiff,

vs.

DOUGLAS LAWRENCE BROWN,

Defendant.

Cause No.: DC-13-64

INFORMATION

Comes now Nick Mazanec, Special Deputy Richland County Attorney, and attorney for the State of Montana, having first obtained leave of Court as required by law, and accuses the Defendant, DOUGLAS LAWRENCE BROWN, of having committed the following offense:

COUNT I

That on or about April 18, 2012, through on or about May 2, 2012, in Richland County, Montana, the Defendant committed the offense of THEFT BY INSURANCE FRAUD, a FELONY, in violation of Mont. Code Ann. §§ 33-1-1202(1), 33-1-1211(2), and 45-6-301(6)(a).

The facts constituting this offense are as follows:

That at the time and place mentioned above, the Defendant purposely or knowingly committed theft by insurance fraud by presenting or causing to be presented written and oral

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1 statements to National Farmers Union Property and Casualty Company containing false,
2 incomplete, or misleading information concerning facts and/or things material to, as part of, or
3 in support of a claim for payment or other benefit pursuant to an insurance policy, for the
4 purpose of obtaining money and/or benefits exceeding \$1,500.

5 Pursuant to Mont. Code Ann. § 45-6-301(8)(b)(i), the offense is punishable by a fine
6 not to exceed \$50,000 and/or imprisonment in a state prison for a term not to exceed 10 years.

7 A list of possible witnesses for the State now known to the prosecution is as follows:

- 8 • John Forsman, Investigator, Helena, MT
- 9 • Nichole Gerhard, SIU Specialist I, G4S Compliance and Investigations, Rancho Cucamonga, CA
- 10 • Kim Schar, Adjuster, QBE Regional Insurance Company, Sun Prairie, WI
- 11 • Cathy Hintz, Agent, Hintz Insurance Agency, Sidney, MT
- 12 • Jennifer Tymofichuk, Internal Probation and Parole, Community Counseling and Correctional Services, Inc., Anaconda, MT
- 13 • Thomas Tighe, Sergeant, Sidney Police Department, Sidney, MT
- 14 • Amanda Fitzgerald, Sidney, MT
- 15 • Heather Burke, Sidney, MT
- 16 • Douglas Brown, Sidney, MT

17 DATED this 23rd day of July, 2013.

18 By: _____

NICK MAZANEC
Special Deputy Richland County Attorney
Special Assistant Attorney General